

EXHIBIT 15

2. Opt-in Plaintiff, Shawn Millender
Who may be reached through counsel
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The Opt-in Plaintiff Millender has information relevant to his employment with M-I and his claims in this litigation.

2. Ryan Bailey
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Mr. Bailey is a supervisory employee of M-I with knowledge concerning Plaintiffs' claims and M-I's defenses including but not limited to the job duties of RCD operators and RCD technicians, Plaintiff Shaffer and/or Millender's job duties and M-I's policies and practices.

3. Dwayne Dell
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Mr. Dell is a supervisory employee of M-I with knowledge concerning Plaintiffs' claims and M-I's defenses including but not limited to the job duties of RCD operators and RCD technicians, Plaintiff Shaffer and/or Millender's job duties and M-I's policies and practices.

4. Caspar Hassall
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Mr. Hassall is a supervisory employee of M-I with knowledge concerning Plaintiffs' claims and M-I's defenses including but not limited to the job duties of RCD operators and RCD technicians, Plaintiff Shaffer and/or Millender's job duties and M-I's policies and practices.

5. Teri Haner
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Ms. Haner is a supervisory employee of M-I with knowledge concerning M-I's payroll and human resources records.

6. Kristi Selva
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Ms. Selva is a supervisory employee of M-I with knowledge concerning M-I's policies and practices regarding reductions in force, and severance plans and payments.

7. Jason Guidry
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Mr. Guidry is an employee of M-I with knowledge concerning RCD Operator and CST positions, including duties, training, and necessary skills. Mr. Guidry also has knowledge concerning Strikeforce operations.

8. Robert Cotton
Who may be reached through counsel
Samuel Zurik III
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Mr. Cotton is a supervisory employee of M-I with knowledge concerning Plaintiffs' claims and M-I's defenses including but not limited to the job duties of RCD operators and RCD technicians, Strikeforce operations, Plaintiff Shaffer and/or Millender's job duties and M-I's policies and practices.

9. Thomas Leonard
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Mr. Leonard is a supervisory employee of M-I with knowledge concerning job duties of CSTs and RCD Operators and the Strikeforce operations unit.

10. Mike Offner
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Mr. Offner is a supervisory employee of M-I with knowledge concerning job duties of CSTs and RCD Operators.

Rule 26(a)(1)(A)(ii):

Description by category and location of all documents, data compilations, and tangible things in the possession, custody, or control of the parties which the disclosing party may use to support its claims or defenses:

1. The following items are in the possession of M-I:
 - A. Personnel documents related to Shaffer and Millender;
 - B. Payroll records and W-2s of Shaffer and Millender.
 - C. Job assignment records for Shaffer and Millender.
 - D. Job descriptions.
 - E. Marketing materials for RCD services.
 - F. Instructional manuals and operating instructions and procedures relating to RCD services.
 - G. M-I Handbooks, policies, and procedures.
 - H. Reports authored or contributed to by Shaffer and/or Millender.
 - I. RCD Daily Reports.

J. Email communications.

2. Any additional documents identified by either party or documents, the relevance of which becomes known through additional investigation and discovery.

Rule 26(a)(1)(A)(iii):

Computation of any category of damages claimed by the disclosing party:

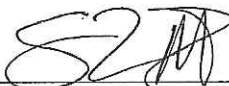
The Defendant is not seeking any damages in this action. As the prevailing party, though, Defendant would be seeking recovery of costs, and reserves the right to seek fees in connection with any baseless claims.

Rule 26(a)(1)(A)(iv):

Any insurance agreement under which any person carrying insurance business may be liable to satisfy a part, or all of a judgment which may be entered in the action or to indemnify or reimburse for payments made to satisfy the judgment:

The Defendant is not aware of any insurance policy that covers this matter.

Respectfully submitted, this 15th day of February, 2016.



Samuel Zurik III (TX Bar No. 24044397)

Robert P. Lombardi (*pro hac vice*)

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**COUNSEL FOR DEFENDANT
M-I L.L.C. D/B/A MI SWACO**

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 15th day of February, 2016, I served a copy of the foregoing via E-Mail and U.S. mail, postage prepaid, to:

Michael A. Josephson
Andrew Dunlap
Lindsay R. Itkin
Fibich, Leebron, Copeland, Briggs & Josephson, L.L.P.
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Houston, TX 77005

Richard J. (Rex) Burch
Bruckner Burch PLLC
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Houston, TX 77046

A handwritten signature in black ink, appearing to read "RJB", is written over a horizontal line.